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**ATTORNEYS FOR PLAINTIFF**  
**MICHEL KECK**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

MICHEL KECK, on behalf of herself and  
others similarly situated,

Plaintiff,

v.

ALIBABA.COM, INC., et al.,

Defendants.

Case No. 5:17-cv-05672-BLF

**CERTIFICATION IN SUPPORT OF  
ENTRY OF DEFAULT BY CLERK  
UNDER FRCP 55(a)**

Judge: Hon. Beth Labson Freeman  
Trial date: Not yet assigned

1 I, Christopher S. Randolph, Jr., hereby certify as follows:

2 1. I am a member of the Alabama bar and an associate at Hare, Wynn, Newell &  
3 Newton, LLP. I am one of the lawyers representing Plaintiff Michel Keck in the above-styled  
4 civil action ("Action"). This Court has granted my application to appear *pro hac vice* in this  
5 Action.

6 2. This Action was commenced on October 2, 2017, when Plaintiff filed her  
7 Complaint in this Court.

8 3. In the Complaint, Plaintiff asserted claims against, among other defendants, the  
9 following businesses: Yiwu Kingsing Art & Crafts Co., Ltd.; Nan'an Yihui Painting & Arts Fty  
10 Co., Ltd.; Wenddy's store; YW-MX-Store; HomeLivingWallArt Store; Ha's World Painting; YD  
11 Oil Painting a/k/a Yuan Dian Handpainted Painting Store; Folash painting art Store; DPARTISAN  
12 Store; Mei Mei; Xia Men Beautiful Art Oil Painting; Xia Men MYT Oil Painting; Dafen Oushi  
13 Oil Painting; Gen Di Micro spray art; Ou Li Da Oil Painting Art; YW-meixiang Store; and  
14 Tonny's Store store (collectively, "Defaulting Defendants").

15 4. On November 28, 2017, Plaintiff filed her Application to Serve Certain Foreign  
16 Defendants by Electronic Means Pursuant to FRCP 4(f)(3) (ECF 39) ("Application"). In that  
17 Application, Plaintiff requested this Court's permission under Federal Rule of Civil Procedure  
18 4(f)(3) to serve the Defaulting Defendants through the Alibaba.com and AliExpress.com  
19 messaging system by sending those defendants through the Alibaba.com or AliExpress.com  
20 messaging system a link from which the summons, complaint, and other documents could be  
21 accessed and downloaded.

22 5. On December 20, 2017, this Court granted the Application (ECF 74).

23 6. On January 2, 2018, Plaintiff served all of the Defaulting Defendants through the  
24 Alibaba.com or AliExpress.com messaging system. Plaintiff filed proofs of service on all of those  
25 defendants with this Court. (ECF 127-128, 133-147)

26 7. More than twenty-one (21) days have elapsed since the Defaulting Defendants were  
27 served with the summons and Complaint.

28 8. Neither Plaintiff, nor the Court, has granted any of the Defaulting Defendants any

1 extension of time to respond to the Complaint.

2 9. None of the Defaulting Defendants have filed an answer or other response to the  
3 Complaint.

4 10. All of the Defaulting Defendants are businesses that market or have marketed  
5 merchandise over the internet. None of the Defaulting Defendants are believed by plaintiff's  
6 counsel to be infants, incompetent persons, or persons serving in the United States military.

7 11. I declare under penalty of perjury under the laws of the United States of America  
8 that the foregoing is true and correct.

9 Executed this 2d day of February 2018 in Birmingham, Alabama.

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